

Joseph H. Mizrahi – Attorney 300 Cadman Plaza W, 12th Floor Brooklyn, NY 11201 P: 929-575-4175 | F: 929-575-4195 E: joseph@cml.legal | W: cml.legal

March 9, 2020

VIA ECF

Honorable Judge Ramos United States District Court Southern District of New York 40 Centre Street New York, NY 10007

Re: <u>Diaz v. Shakespeare All Star Acquisition LLC; Case No: 1:19-cv-06979-ER</u>

Dear Judge Ramos,

This firm represents Plaintiff Edwin Diaz (hereinafter "Plaintiff") in this matter, which involves claims asserted under Title III of the ADA, 42 U.S.C. § 12181.

As per the Court's February 10, 2020 Order, the parties were granted 30 days in which to restore the case to the court's calendar. It is now March 9, 2020, and the parties are in the final phase of settlement on the matter. At this time, Counsel for the Plaintiff respectfully requests an additional 30 days in which to finalize the terms of the agreement and thereafter file a Stipulation of Dismissal. Counsel for Defendant consents to the above request.

Respectfully submitted,

/S/ Joseph H. Mizrahi Joseph H. Mizrahi, Esq.

Cc: All counsel of record (Via ECF)

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC#

DATE FILED: March 9, 2020

The application is X granted

____ denied

Edgardo Ramos, U.S.D.J Dated: March 9, 2020

New York, New York